

# **EXHIBIT I**

1 KEKER & VAN NEST LLP  
ROBERT A. VAN NEST - # 84065  
2 rvannest@kvn.com  
BRIAN L. FERRALL - # 160847  
3 bferrall@kvn.com  
DAVID J. SILBERT - # 173128  
4 dsilbert@kvn.com  
MICHAEL S. KWUN - # 198945  
5 mkwun@kvn.com  
633 Battery Street  
6 San Francisco, CA 94111-1809  
Telephone: 415 391 5400  
7 Facsimile: 415 397 7188

8 Attorneys for Defendant ARISTA NETWORKS, INC.

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 CISCO SYSTEMS, INC.,

14 Plaintiff,

15 v.

16 ARISTA NETWORKS, INC.,

17 Defendant.  
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Case No. 5-14-CV-05344-BLF

**DEFENDANT ARISTA NETWORKS,  
INC.'S RESPONSES TO PLAINTIFF  
CISCO SYSTEM INC.'S FIRST SET OF  
INTERROGATORIES  
(NOS. 1-13)**

only recently begun, and Arista's investigation in this matter is ongoing.

Subject to and without waiving the foregoing general and specific objections, Arista responds as follows:

The following versions of EOS have been developed by Arista.: 4.14.5.1-SSU; 4.15.0; 4.14.5-SSU; 4.12.10; 4.13.11; 4.14.4.1; 4.14.5FX; 4.14.6; 4.13.10; 4.13.9.1; 4.14.5; 4.11.11; 4.14.4; 4.13.7.3; 4.12.9; 4.13.9; 4.14.3; 4.13.8; 4.14.2; 4.11.10; 4.14.1; 4.13.7.2; 4.12.8.1; 4.14.0; 4.13.7.1; 4.13.7; 4.13.3.4; 4.13.3-l3scale; 4.13.5.1; 4.12.8; 4.11.9; 4.13.6; 4.12.7.1; 4.11.8.2; 4.10.8.1; 4.9.11; 4.8.12; 4.13.4.1; 4.13.3.1; 4.13.5; 4.10.8; 4.13.4; 4.11.8.1; 4.12.7; 4.11.8; 4.13.3; 4.13.2; 4.9.10; 4.12.6; 4.13.1; 4.13.0; 4.11.7.1; 4.12.5.1; 4.11.7; 4.10.7; 4.12.5; 4.12.0.5; 4.12.4.1; 4.12.4; 4.8.11; 4.11.6; 4.12.3.1; 4.12.2.1; 4.9.9; 4.10.6; 4.12.3; 4.12.2; 4.11.5.1; 4.11.5; 4.11.4.3; 4.12.1; 4.9.8; 4.11.4.2; 4.10.5; 4.12.0; 4.11.4; 4.11.3; 4.12.0-7500-EFT; 4.10.4.0.2; 4.11.2.2; 4.10.4-OpenFlow; 4.11.2.1; 4.10.4.0.1; 4.11.2; 4.8.10; 4.10.4; 4.9.7; 4.11.1; 4.11.0; 4.8.9; 4.10.0.2-7150; 4.10.3; 4.9.6; 4.10.0.1-7150; 4.10.0-7150; 4.10.2; 4.10.1-SSO; 4.8.8 4.9.5; 4.10.1; 4.8.7.1; 4.8.7; 4.10.0; 4.10.0-SSO; 5.0.0; 4.9.4; 4.9.3.2; 4.9.3.1; 4.9.3; 4.8.6; 4.9.2; 4.8.5; 4.8.4; 4.9.1; 4.9.0; 4.8.3; 4.8.2.1; 4.8.2; 4.7.8; 4.7.7.1; 4.8.1; 4.7.7; 4.7.6; 4.7.5; 4.7.3.1; 4.7.4; 4.7.3; 4.6.4; 4.7.0; 4.6.3; 4.6.2; 4.6.1; 4.6.0; 4.5.5; 4.5.4; 4.5.3; 4.5.2; 4.5.1; 4.4.3; 4.5.0; 4.4.2; 4.4.0; 4.3.2; 4.3.1; 4.3.0; 4.2.3; 4.2.2; 4.2.1; 4.2.0; 4.1.0; 4.0.0; 3.1.0; 3.0.0; 2.3.0; 2.2.0; 2.1.0; 2.0.5; 2.0.4; 2.0.0; 1.1.0; 1.0.0.

Arista is willing to meet and confer with Cisco about what additional information, if any, is appropriate to provide in response to a narrowly tailored interrogatory relating to this subject matter.

### **INTERROGATORY NO. 3:**

For each quarter dating back to October 2004, for each Accused Product, state (i) the total number of units sold, (ii) the gross revenue (in U.S. dollars), (iii) the net profits (in U.S. dollars), (iv) the profit margins (in U.S. dollars), and (v) the costs (in U.S. dollars) associated with each Accused Product.

### **RESPONSE TO INTERROGATORY NO. 3:**

Arista incorporates its General Objections above as though set forth in this response. The

1 request is also overbroad and unduly burdensome because it seeks information about “each  
2 Accused Product,” where “Accused Product” is defined as “any Product designed, manufactured,  
3 marketed, offered for sale, sold, and/or imported by, at the direction of, under the control of,  
4 and/or subject to contract or agreement with Arista.” Arista objects to this interrogatory to the  
5 extent it seeks information that is already in the possession, custody, or control of Cisco, or that is  
6 publicly available. Arista objects to this interrogatory as vague, ambiguous, overbroad, unduly  
7 burdensome and not reasonably calculated to lead to the discovery of admissible information.  
8 Arista further objects to this interrogatory as premature given that discovery in this action has  
9 only recently begun, and Arista’s investigation in this matter is ongoing.

10 Subject to and without waiving the foregoing general and specific objections, Arista  
11 responds as follows:

12 Arista does not keep information in the form requested by this interrogatory in the  
13 ordinary course of business. Pursuant to Federal Rule of Civil Procedure 33(d), Arista will  
14 supplement this response to identify the Bates numbers of documents containing information  
15 relevant to this interrogatory that Arista maintains in the ordinary course of business.

16 **INTERROGATORY NO. 4:**

17 Identify the date and circumstances under which You first became aware of the Asserted  
18 Patents or the applications that matured into the Asserted Patents, and identify each Entity who  
19 became aware of the Asserted Patents at that time.

20 **RESPONSE TO INTERROGATORY NO. 4:**

21 Arista incorporates its General Objections above as though set forth in this response.  
22 Arista objects to this interrogatory to the extent it seeks information that is already in the  
23 possession, custody, or control of Cisco, or that is publicly available. Arista objects to this  
24 interrogatory as vague, ambiguous, overbroad, unduly burdensome and not reasonably calculated  
25 to lead to the discovery of admissible information. The request is vague and ambiguous in its use  
26 of the phrase “circumstances.” Arista objects to this interrogatory to the extent it calls for, or may  
27 be construed as calling for, information protected from discovery by the attorney-client privilege,  
28 work product doctrine, or any other common law or statutory privilege or protection. Arista further

## PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Keker & Van Nest LLP, 633 Battery Street, San Francisco, CA 94111-1809.

On April 30, 2015, I served the following document(s):

- **DEFENDANT ARISTA NETWORKS, INC.'S RESPONSES TO PLAINTIFF CISCO SYSTEM INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-13)**

☒ by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe "pdf" format. The transmission was reported as complete and without error.

Sean Sang-Chul Pak  
John M. Neukom  
Quinn Emanuel Urquhart & Sullivan LLP  
50 California Street, Floor 22  
San Francisco, CA 94111  
Tel: (415) 875-6320  
Fax: (415) 875-6700  
[seanpak@quinnemanuel.com](mailto:seanpak@quinnemanuel.com)  
[johnneukom@quinnemanuel.com](mailto:johnneukom@quinnemanuel.com)  
[Cisco-Arista@quinnemanuel.com](mailto:Cisco-Arista@quinnemanuel.com)

Adam R. Alper  
Kirkland & Ellis LLP  
555 California Street  
San Francisco, CA 94104  
Tel: (415) 439-1476  
Fax: (415) 439-1500  
[aalper@kirkland.com](mailto:aalper@kirkland.com)

Kathleen Marie Sullivan  
Quinn Emanuel Urquhart & Sullivan LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10022  
Tel: (212) 0 849-7000  
[kathleensullivan@quinnemanuel.com](mailto:kathleensullivan@quinnemanuel.com)

Mark Yeh-Kai Tung  
Quinn Emanuel Urquhart & Sullivan LLP  
555 Twin Dolphin Drive, 5th floor  
Redwood Shores, CA 94065  
Tel: (650) 801-5000  
[marktung@quinnemanuel.com](mailto:marktung@quinnemanuel.com)

Michael W. De Vries  
Kirkland & Ellis LLP  
333 South Hope Street, 29th floor  
Los Angeles, CA 90071  
Tel: (213) 680-8590  
Fax: (213) 680-8500  
[michael.devries@kirkland.com](mailto:michael.devries@kirkland.com)  
[Cisco-AristaCopyrightTeam@kirkland.com](mailto:Cisco-AristaCopyrightTeam@kirkland.com)

Steven C. Cherny  
Kirkland & Ellis LLP  
601 Lexington Avenue  
New York, NY 10022  
Tel: (212) 446-4800  
Fax: (212) 446-6460  
[Steven.cherny@kirkland.com](mailto:Steven.cherny@kirkland.com)

1 Executed on April 30, 2015, at San Francisco, California.

2 I declare under penalty of perjury under the laws of the State of California that the above is true  
3 and correct.

4  
5 /s/ Alisa Thompson

Alisa Thompson  
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